

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA**

(1) WARREN CAPITAL
CORPORATION, an Oklahoma
Corporation

Plaintiff,

vs.

Case No.: 14-CV-236-TCK-TLW

(1) JESSE T. HOLLAND, (2) KATIE A.
HOLLAND, (3) WILLIAM F. ELDER,
Individuals, and (4) KTW Oil & Gas, LLC,
a foreign limited liability company.

Defendants.

**JOINT MOTION TO EXTEND
DEADLINE FOR FILING OF DISMISSAL PAPERS**

COME NOW the Plaintiff and all Defendants, jointly and through counsel, and
for this Motion to Extend Deadline for Filing of Dismissal Papers state as follows.

1. On October 16, 2014, the Court entered the following minute:

MINUTE ORDER by Judge Terence Kern - The parties
advised they reached a conditional settlement. Dismissal
papers are due 1/15/15. All deadlines in the scheduling
order have been stricken;

2. The parties have not concluded the settlement through the execution of
settlement documents.

3. A disagreement has arisen between the parties as to the respective
obligations of the parties under the settlement agreement.

4. The parties are working in good faith to resolve the disagreement and
believe in good faith they can resolve the disagreement. However, resolution of the

disagreement will require additional time and the parties do not believe they can resolve the disagreement by January 15, 2015.

5. The parties, if additional time is not granted for the filing of dismissal papers, will be forced to either file motions to enforce the settlement agreement or for the entry of an order for new deadlines so the case can proceed.

6. The parties desire to continue to proceed in good faith toward completion of the settlement, under the terms outlined in the written settlement agreement and without prejudice to their rights under the settlement agreement, but need additional time to do so.

7. The parties agree that the filing of this joint motion is not a waiver of any rights under the written settlement agreement, nor a waiver of any right to complain of the other party's breach of the settlement agreement, nor a modification of any term of the settlement agreement.

8. As such, and in the interests of judicial economy, the parties request that the Court reset the January 15, 2015 deadline for Dismissal papers (Dkt No. 23) – by forty five (45) days – until March 2, 2015.

9. If such leave is granted, the parties will advise the Court of the final disposition of this settlement agreement (through a Joint Stipulation of Dismissal or otherwise) by March 2, 2015.

WHEREFORE, the Parties jointly request the Court enter an Order modifying/ extending the current Order regarding case schedule (Dkt. No. 23) by forty five (45) days, for the reasons stated above.

Respectfully submitted,

/s/ Trevor L. Hughes
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ATTORNEYS FOR PLAINTIFF

-And-

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**ATTORNEY FOR ALL
DEFENDANTS**

CERTIFICATE OF SERVICE

This is to certify that on January 13, 2015, the undersigned electronically transmitted the attached document to the Clerk of the Court using the ECF system for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to all ECF registrants:

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**ATTORNEYS FOR PLAINTIFF
WARREN CAPITAL CORP.**

/s/ Trevor L. Hughes